

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL INC.
SECURITIES LITIGATION

No. 3:14-CV-00682-JAG

CLASS ACTION

**JOINT MEMORANDUM IN SUPPORT OF JOINT MOTION TO MODIFY AMENDED
PRETRIAL ORDER**

Lead Plaintiffs Her Majesty The Queen In Right Of Alberta (“Alberta”) and the Fresno County Employees’ Retirement Association (“Fresno,” and together with Alberta, “Lead Plaintiffs”), and Defendants Genworth Financial Inc., (“Genworth”), Thomas J. McInerney, and Martin P. Klein (collectively with Genworth, “Defendants”) (collectively with Lead Plaintiffs, the “Parties”), by counsel, respectfully and jointly submit this memorandum in support of their Joint Motion to Modify Amended Pretrial Order, stating as follows:

The Parties have met and conferred regarding a limited number of court-imposed deadlines relating to expert witness reports and other discovery issues. Following this successful meet and confer, the Parties agreed to jointly move the Court to modify the following selected deadlines, which the Parties agree would be mutually beneficial in light of the deposition schedule and upcoming holidays, and would help to ensure complete and fair fact and expert discovery:

- Expert witness reports for a party with the burden of proof on an issue, previously due December 18, 2015, would be due December 21, 2015;

- Opposing party expert witness reports, previously due January 11, 2016, would be due January 13, 2016;
- Rebuttal expert witness reports, previously due January 25, 2016, would be due January 27, 2016;
- Discovery related to expert witness, previously due to be completed by January 25, 2016, would be completed by February 4, 2016; and
- Requests for admission, previously due to be served no later than December 14, 2015, would be served no later than December 23, 2015.

The Parties have ensured that the modification of these deadlines will not affect the deadlines for any submissions to the Court, nor will it affect the Court's time for considering written submissions in any way.

Accordingly, and for good cause shown, the Parties respectfully request that the Court grant the Joint Motion and enter an order modifying the Court's October 6, 2015 Amended Pretrial Order (ECF No. 106) (as amended by the Court's December 10, 2015 Memorandum Order (ECF No. 131)) to reflect these new deadlines. A proposed order is attached to the Joint Motion as Exhibit A.

Dated: December 18, 2015

Respectfully submitted,

/s/ Brian E. Pumphrey

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CERTIFICATE OF SERVICE

I certify that on this 18th day of December 2015, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/ Brian E. Pumphrey

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